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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ABHIJIT BAGAL,

Plaintiff,

v.

RUTGERS, THE STATE
UNIVERSITY OF NEW JERSEY, *et*
al.,

Defendants.

Civil Action No.: 3:24-cv-11440-
ZNQ-JBD

**DECLARATION OF JEFFREY
SOOS, ESQ. IN SUPPORT OF
DEFENDANTS' MOTION TO
DISMISS PLAINTIFF'S AMENDED
COMPLAINT PURSUANT TO
FED. R. CIV. P. 12(B)**

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JEFFREY SOOS, of full age, declares as follows:

1. I am a member of the law firm of Saiber LLC, attorneys for Defendants Rutgers, the State University of New Jersey ("Rutgers"), Jonathan Holloway, Jeffrey

Robinson, Enobong (Anna) Branch, Jaqueline S. Mattis, Lucille Foster, Corrine Castro, and Audrey Truschke (collectively, “Defendants”) in the above matter.

2. I am fully familiar with the matters set forth herein, and submit this declaration in support of Defendants’ Motion to Dismiss the Amended Complaint of Plaintiff Abhijit Bagal (“Plaintiff”).

3. A true and correct copy of the Report regarding Caste-Based Discrimination in U.S. Higher Education and at Rutgers, along with the Rutgers University Statement on the Posting of this Report, which was published in August 2024, referenced and relied upon in Plaintiff’s Amended Complaint, and publicly available at [chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://laborrelations.rutgers.edu/sites/default/files/document/Rutgers%20Caste%20Report%20August%202024.pdf](https://laborrelations.rutgers.edu/sites/default/files/document/Rutgers%20Caste%20Report%20August%202024.pdf), is attached hereto as Exhibit 1.

4. A true and correct copy of the University January 13, 2025 Response to Task Force on Caste Discrimination Report, which is publicly available at <https://laborrelations.rutgers.edu/updates-announcements>, is attached hereto as Exhibit 2.

5. A true and correct copy of the email from counsel for Defendants dated January 18, 2025, asking Plaintiff if he will be withdrawing his Complaint and the

email response from Plaintiff dated January 19, 2025, refusing to withdraw the Complaint, is attached hereto as Exhibit 3.

6. A true and correct copy of the District of Washington's decision in *Bagal v. Sawant, et al.*, No. 23-721 (D. Wash. Mar. 8, 2024) is attached hereto as Exhibit 4.

7. A true and correct copy of the Ninth Circuit's decision in *Bagal v. Sawant, et al.*, No. 24-1488 (9th Cir. Jan. 21, 2025) is attached hereto as Exhibit 5.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 24th day of March, 2025.

s/ Jeffrey Soos
JEFFREY SOOS

Dated: March 24, 2025